

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

THE MERCY HOSPITAL, INC.,

Plaintiff

v.

MASSACHUSETTS NURSES
ASSOCIATION,

Defendant

Civ. No. 04-30014-MAP

AFFIDAVIT OF MARK A. HICKERNELL

I, Mark A. Hickernell, do hereby swear and affirm as follows:

1. My name is Mark A. Hickernell. I represent the Massachusetts Nurses Association in this matter as well as in the arbitration of the underlying grievance.
2. Attached as Exhibit 1 hereto is the collective bargaining agreement introduced in evidence at arbitration.
3. Attached as Exhibit 2 hereto is the Hospital's Medication Events and Adverse Drug Reactions policy introduced in evidence at arbitration.

Signed under the pains and penalties of perjury.

Date: July 23, 2004



Mark A. Hickernell